



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D. C. 20460

E.13.115 A-2

OFFICE OF ENFORCEMENT

Monsanto Industrial Chemicals Co.,
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

Gentlemen:

Recent governmental sampling data indicate the presence of Polychlorinated Biphenyls (PCBs) and comparable chemical substances in the air, in water bodies, and in fish in several areas of the country. In order to determine the nature and extent of the possible adverse effects resulting from the presence of PCB compounds in the environment, the Environmental Protection Agency (EPA), in cooperation with other federal and State agencies, is attempting to determine the sources and amounts of PCBs entering the environment. It is important that this effort be carried out without delay.

It is our understanding that your company handles PCB compounds or mixtures or comparable chemical substances in its operations. I am therefore requesting, pursuant to the authority provided by Section 308 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. 1318, and Section 114 of the Clean Air Act, as amended, 42 U.S.C. 1857c-9, that your company furnish EPA with information pertaining to your use and handling of PCBs and comparable chemical substances. In addition to a general description, which should include information as to sources, quantities, uses, and ultimate disposition, you should respond in detail to the enclosed questions. If any question is not applicable to your company or operations, please so indicate by responding "not applicable."

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. Should you so request, however, any information (other than effluent or emission data) which the Administrator of this Agency determines to constitute methods or processes entitled to protection as trade secrets will be maintained as confidential, pursuant to procedures specified in 40 CFR Part 2.

This letter was sent out undated. It was mailed on 10-23-75

Date - 10/17/75

AKHQ 0001352



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Within 14 days of receipt of this letter, your company must provide all information concerning your current status and activities and covering the twelve month period immediately preceding receipt of this letter.

Within 30 days following receipt of this letter, your company must provide all information for all of the prior years indicated.

The information required herein should be sent directly to the address indicated below. If you have any questions you may call the person indicated below or Mr. Blake A. Biles of our office at (202) 755-8731.

We appreciate your prompt cooperation in this matter.

Sincerely yours,

Stanley W. Legro
Assistant Administrator
for Enforcement

Enclosure

Regional Contact:
Mr. Earl J. Stephenson
Director, Enforcement Division
Environmental Protection Agency
1735 Baltimore
Kansas City, Missouri 64108
Telephone: (816) 374-2576

Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63186
Phone: (314) 694-1000

November 10, 1975

Mr. Blake Biles
Office of Enforcement
United States Environmental
Protection Agency
Waterside Mall
401 M Street, S. W.
Washington, D. C. 20460

Dear Mr. Biles:

As discussed Friday during our telephone conversation, I am finding the mechanics of assembling the information for responding to the questionnaire attached to Mr. Stanley W. Legro's letter of October 17 to be very time consuming. As you know I was not able to meet the 14-day requirement for supplying recent information.

At your request I have attempted to predict the dates when I will be able to forward meaningful responsive information. The best estimate I can reach at this time is that I may be able to supply the requested information by December 15. It is my personal belief that if the information is supplied in one report, it would give a more complete description of the available PCB - PCT information.

One of the principal reasons for the delay is that polychlorinated terphenyl (PCT) information is requested. Since Monsanto terminated the manufacture and sale of these materials in 1972 and since no environmental effects have been reported, I suggest you may consider deleting the PCT request at this time.

AKHQ 0001354

4

Mr. Blake Biles

Page 2

November 10, 1975

As you suggested, it is possible that some of the available PCB information could be forwarded before the final report is submitted. Since much of the information I have reviewed to date consists of many interrelated parts, I would be concerned that the submission of partial information may lead to misunderstandings, or more likely, create the need for time consuming explanations which may defeat the purpose and still prolong the completion of the report.

Your favorable consideration of a time extension would be sincerely appreciated.

Sincerely,

W B Papageorge
W. B. Papageorge
Manager, Product Acceptability
Process Chemicals Division

WBP:pd

cc: Mr. Mike Sanderson
Enforcement Division
Environmental Protection Agency
1735 Baltimore
Kansas City, Missouri 64108

AKHQ 0001355

80
Monsanto



MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 694-1000

December 11, 1975

Mr. Earl J. Stephenson
Director, Enforcement Division
Environmental Protection Agency
1735 Baltimore
Kansas City, Missouri 64108

Dear Mr. Stephenson:

Attached is a response to the questionnaire which accompanied Mr. Stanley Legro's letter dated October 17, 1975.

To the best of my knowledge and belief, the information contained in this response represents the best information available to Monsanto.

If I can be of further assistance, please let me know.

Sincerely,

W. B. Papageorge
Manager, Product Acceptability
Process Chemicals Division

ajt

Attachment

CC: Mr. Stanley W. Legro
US Environmental Protection Agency
401 "M" Street, SW
Washington, D.C. 20460

POLYCHLORINATED BIPHENYL (PCB) COMPOUNDS OR MIXTURES

In this response the phrase "PCB compound or mixture" includes those materials listed under Base Products in Exhibit A.

1. (a) Monsanto Industrial Chemicals Company does not import PCB compounds or mixtures. Amounts produced for 1971, 1972, 1973, 1974 and the first three quarters of 1975 are included in Exhibit C.

- (b) Production facilities:

For 1971 and 1972

Monsanto Company
Box 249
Anniston, Alabama 36201

For 1971 to present

Monsanto Company
Route 3
Sauget, Illinois 62201

The amounts produced at the Anniston, Alabama plant are shown on Exhibit D. The Sauget, Illinois unit produced the amounts shown on Exhibit E. Wholesale and retail outlets are not used.

- (c) See Exhibit F for 1971, Exhibit G for 1972, Exhibit H for 1973 and 1974 and Exhibit I for 1975. The PCB compounds or mixtures from the Anniston, Alabama facility are listed in Exhibit D. The remaining were shipped from the Sauget, Illinois facility.
2. (a) See Exhibit A - pages 2, 3 and 4 and Exhibit B.
- (b) See Exhibit A - pages 2, 3 and 4.
 - (c) The PCB compounds or mixtures used were produced by Monsanto. See 1(b).
 - (d) Production facilities are those shown under 1(b) and for 1971 and 1972 also included Monsanto Company, 1700 South Second Street, St. Louis, Missouri 63177. Products distributed through Monsanto's Anniston, Alabama unit are shown on Exhibit D. All Pyral products were distributed through the St. Louis, Missouri facility. Remainder of products distributed through the Sauget, Illinois unit. Amounts distributed are shown on the exhibits listed in 2c below.

- (e) See Exhibit F for 1971, Exhibit G for 1972, Exhibit H for 1973 and 1974 and Exhibit I for 1975. The products obtained from the Anniston, Alabama facility are listed in Exhibit D. The Pydraul products originated at the St. Louis, Missouri unit. The remaining were shipped from the Sauget, Illinois facility. We do not manufacture consumer products containing PCB compounds or mixtures.
- 3. (a) During 1971 and 1972 PCB compounds or mixtures were used as heat transfer fluids, hydraulic fluids and in transformers and capacitors. During the latter part of 1972, 1973, 1974 and 1975 PCB compounds or mixtures are only present in transformers and capacitors.
- (b) See Exhibit J. Amounts shown are for total Monsanto Company usage. No records are available to determine specific company facility. Inerteen was used in transformers. Pydrauls in air compressors. Therminols in industrial heat transfer systems.
- (c) The PCB products were all produced by Monsanto Company. The specific sources are shown on Exhibit J.
- 4. PCB compounds or mixtures are not reclaimed.
- 5. (a) During 1971 and 1972 solid waste material contaminated with PCB compounds or mixtures were buried in a secure landfill located within a fenced area on property owned by Monsanto Company at the Anniston, Alabama facility. Similar waste has also been buried in a secure landfill located on Monsanto Company property at the Sauget, Illinois facility during the period 1971 - 1975. Liquid wastes have been disposed by incineration for the period 1971 - 1975 in a high temperature unit located at the Sauget, Illinois facility. During 1975 solid waste was sent to Texas Ecologists, P. O. Box 307, Robstown, Texas 78380.
- (b) Waste materials containing PCB compounds or mixtures are received from many sources. The type of PCB compound or mixture in the waste is unknown. The concentration is also unknown. Solid waste is estimated as containing levels ranging from the ppm level to 50% by weight. Liquid waste is estimated to contain about 90% PCB compound or mixture.

For amounts disposed see Exhibit K. Note the amounts shown refer to the total weight of waste. The actual PCB content is unknown.
- (c) See Exhibit K for total waste disposed. Concentration and type of PCB compound or mixture are unknown.

- (d) See Exhibit L. Total amounts of waste are shown. Concentration and type of PCB compound or mixture are unknown.
- (e) See 5a for name and location. See Exhibit K for amount disposed.
- 6. See Exhibit A. Monsanto Company does not import or reclaim PCB compounds or mixtures. Composition of disposed material is unknown but can range from ppm level to 100% by weight PCB.
- 7. (a) See Exhibit M for Sauget, Illinois facility waste effluent analyses. See Exhibit N for Anniston, Alabama facility water effluent analyses. For PCB emissions to the atmosphere at the Sauget, Illinois facility see Exhibit O. Analyses of air emissions were not made at the Anniston, Alabama facility.
- (b) See Exhibits M, N and O.
- (c) No information is available regarding the Anniston, Alabama facility. No information is available relating to PCB concentration in the air in the area of the Sauget, Illinois facility. Samples of the Mississippi River were taken in 1972. Results were as follows:

<u>*Sample Date</u>	<u>Location</u>	<u>mg/l PCB</u>
10/30/72	T.B. Bridge (downstream)	0.00012
12/13/72	Chain of Rocks Bridge (upstream)	0.0002 - 0.0004
12/12/72	N. of Ill. River (upstream)	0.0002 - 0.0004

*Analytical blank value at 0.00005-0.00017

- 8. (a) PCB compounds or mixtures are liquids and are transported in bulk or in steel drums.
- (b) See Exhibit P for transporters of PCB compounds or mixtures from Monsanto facilities. Transporters of material returned for disposal can be any common carrier serving the St. Louis, Missouri area.

9. Monsanto Company is not aware of any occasion in which PCB compounds or mixtures were introduced into the environment which is not already known to representatives of the Environmental Protection Agency. Examples include the contamination of fish meal in North Carolina, the drainage of fluid from a transformer in transit in Tennessee and the leakage of fluid from a damaged transformer in the Duwamish waterway in Washington.
10. Monsanto Company is not aware of any health or environmental effects resulting from the introduction of PCB compounds or mixtures into the environment which has not been reported in the scientific and popular press and already known to representatives of the Environmental Protection Agency.
11. (a) Monsanto Company has received reports that about 1800 drums of PCB compounds or mixtures are being offered by a company located in the northeastern U.S. for sale for any application. This information was received from Mr. Robert Laham, Hub Fabric Leather Company, 7 Charlton Street, Everett, Massachusetts 02149. This has been discussed with a representative of the Environmental Protection Agency.

Recently Pyramid Chemical Sales Company, 1035 Virginia Drive, Fort Washington, Pennsylvania 19034 has advertised the availability for any application of Aroclor 1221, Aroclor 1232 and Arclor 5460. A representative of the Environmental Protection Agency has been informed.

01/12/12

ORGANIC DIVISION SPECIALTY PRODUCTS
PRODUCT/CUSTOMER SALES REPORT

FUR DEL 1911

PAGE 69

~~-IN THOUSANDS OF POUNDS AND DOLLARS-~~

Q R Y	NAME OF PRODUCT/CUSTOMER	POTENTIAL	LAST YEAR SALES	SALES FOR CURR. YEAR	SALES CURR. YTD	JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	CUST. ID / MAY GND CR.
	THERMINOL FR-1																00350A	1040-245-10
1133	SEA PASS CORP ST LOUIS MO		1.20															10071763
1134	DESOTO INC CHICAGO IL	1.20		1.20														10021855
1134	DE SOTO INC CHICAGO HEIGHTS IL	6.00	6.00	6.00	2.40		2.40											10021098
1974	DE SOTO INC GARLAND TX	.600	.600	.600														10021901
	PARENT CUST. TOT-SEARS ROEBUCK C	7.80	6.60	7.80	2.40		2.40											00045276
1134	ALLIED PROCESSING CHICAGO ILL	.165		.165														00136401
1958	SHELL CHEM DEER PK TX	1.20	.600	1.20														10072331
1956	SHELL OIL COLETA CAL	8.00		8.00	3.00									3.00				10072522
1968	SHELL OIL CO MORGAN CITY LA	10.0	24.6	10.0														00186635
	PARENT CUST. TOT-SHELL OIL NYC N	19.4	25.2	19.4	3.00									3.00				00045284
1958	C E SHEPHERD HOUSTON TX		.220		.530					.275		.275						00216941
1958	SHERWIN WILLIAMS OAKLAND CA				7.20									7.20				10072638
1134	SHERWIN WILLIAMS CHGO IL	3.60		3.60														10072554
1178	SHERWIN WILLIAMS CINCINNATI OH	2.00	3.60	2.00														00050024
	PARENT CUST. TOT-SHERWIN WILLIAM	5.60	3.60	5.60	7.20									7.20				10072794
1956	SIERRA ENGIN SIERRA MADRE CA		.600															10072921
1938	AI RESEARCH MFG CO TORRANCE CAL	6.00		6.00	.110					.110								10001521
1974	A O SMITH INDLAND LITTLEROK AR	2.00	.600	2.00	1.20							.600			.600			00139266
1932	HENRY T SMITH CO MEMPHIS TN	.100	.110	.100														00225711
1932	SOU VALLEY CO COLUMBIA SC	3.00	2.40	3.00														10073837
1932	SOU TEX CHEM HT HOLLY NC	1.20		1.20	.600						.600							00073866
1220	SOUTHERN ADHES RICHMOND VA				6.60		6.60											10073979
1958	SOUTHERN NATURAL GAS AMELIA LA				9.00												9.00	00272051
1932	SOUTHERN NATL GAS MORGAN CT LA				14.4								6.00	9.00		.60	9.00	00262761
1958	SOUTHERN NATURAL GAS HOUSTON TX	60.0		60.0														00222038
	PARENT CUST. TOT-SOUTHERN NATR G	60.0		60.0	23.4								6.00	9.00		.60	9.00	00181129
1932	SOUTHERN LAKERY CO ATLANTA GA	.600		.600														00184640
1178	SOUTHWIRE ALUM HAWESVILLE KY	20.0	94.8	20.0	.129	9.0	12.0	7.2		14.4	28.8		28.8	28.8				00215552
1956	SOUTHWEST FOREST SANTA FE CA	1.00	.875	1.00														00133614
1178	SPECIALTY PAPER DAYTON OH	4.80	4.80	4.80	16.2			1.20	6.00			9.00						10074014
1936	SPECTRICON INC SANTA ANA CALIF		.165															00106673
1968	ST VINCENTS HOSPITAL LOS AN C	70.0																00222143
1932	STO CHEM PRODUCTS CHARLOTTE NC	.500	.600	.500														00133594
1252	STO CHEMICAL PRO HOBOKEN NJ				1.18					.58			1.20	.60				00222100
	PARENT CUST. TOT-STO CHEMICAL PR	.500	.600	.500	1.18					.58			1.20	.60				00222100
1956	STANDARD FELT ALHAMBRA CA		.165		.600				.600									00241903

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210

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01/12/72

ORGANIC DIVISION SPECIALTY PRODUCTS
PRODUCT/CUSTOMER SALES REPORT

FOR DEC 1971

PAGE 28

- IN THOUSANDS OF POUNDS AND DOLLARS -

QTY REV	NAME OF PRODUCT/CUSTOMER	POTENTIAL	LAST YEAR SALES	SALES QUOTA FOR CURR. YEAR	SALES CURR. YTD	JAN.	FEB.	MAR.	APR.	MAY	JUNE	JULY	AUG.	SEPT.	OCT.	NOV.	DEC.	CUSTOMER / MATERIAL CODE
	ANJOLOR 1254																00351A	1040-280-1
5612	REPUBLIC DYE - CHEM AKRON OH		.120															10072835
5612	REPUBLIC FPD MTLA MTLA OHIO		.120															00134240
5607	RICHARDSON PAINT PHILADE PA		.600															00224455
5619	SUGAR S SILICONE PPD FAIRFELD NJ		.120															00184373
5667	SANDERS PAINT INC TUCKER GA		.060															00187358
5629	GLIDDEN CO SAN FRANCISCO CA		1.20															10033760
5612	GLIDDEN CO READING PA		.600															10033338
	PARENT CUST. TOT-S C N CORP CORP		1.80															00045454
5724	DESOTO INC CHICAGO IL		2.40															10021855
5724	SHANNICE PLAST EVANSVILLE IN		.120															10072212
5729	SHELL CHEM DEER PK TX		12.0															10072351
5612	SHERWIN WILLIAMS GARLAND TX		16.8															10072800
5612	SHERWIN WILLIAMS LOS ANGE CA		1.20															00137939
5612	SHERWIN WILLIAMS GARLAND CA		1.20															10072558
5612	SHERWIN WILLIAMS CHGO IL		36.8															10072854
5612	SHERWIN WILLIAMS GIBBSBORO NJ		7.20															10072897
5612	SHERWIN WILLIAMS CLEVELAND OH		151															10072194
	PARENT CUST. TOT-SHERWIN WILLIAM		223															10072194
5616	SOLAR COMPOUNDS LINDEN NJ		10.8															10073766
5616	SUNBORN BUILD BELLEVILLE NJ		313															10072854
5609	SPARKING PLASTICS PLYMOUTH MI		.500															00213578
5610	SPECTRACHEM CORP PATERSON NJ		.060															00130691
5642	STANDARD DRY WALL EGGELY PA		6.00															00177350
5616	STANDARD PACKAGING GRANDURY NJ		1.80															10075173
5625	STATE CHEM CO LUGOCK TX		.060															00135092
5616	STAUFFER GALLIPOLIS FERRY WV		4.20															10075637
5722	STEELCOTE REG ST LOUIS MO		9.00															10075742
5722	STEALING LACQUER ST LOUIS MO		.600															10075920
5725	SULLIVAN CO SAN FRANCISCO CALF		.120															00186103
5616	SUN CHEM PATTERSON NJ		6.00															00135416
5616	SUN CHEMICAL BROOKLYN NY		.060															00224926
	PARENT CUST. TOT-SUN CHEMICAL CO		6.06															10076714
5645	SUN OIL CO MARCUS Hook PA		4.80															10076838
5654	SWIFT - CO WEST HAVEN CON		.600															10077502
5761	TAB CHEMICALS INC CHICAGO ILL		45.0															10077842
5116	TECH RUBR & PLASTIC CLIFTON NJ		.060															00227420
5116	TEMPIL DIVISION S PLAINFIELD NJ		.130															00183652
5645	TENNECO INC OF DIV HAZLETON PA		.060															00140147

342

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-Continued-

PCB WASTE RETURNS

<u>Vendor</u>	<u>1973</u>	<u>Pounds</u>
Owens Corning Anderson, S.C. Toledo, Ohio		9,084 12,705
Owens Illinois Lakeland, Fla. Los Angeles, Calif.		445 350
Oxford Paper Rumford, Maine		3,525
Petroleum Dist. Co. Houston, Texas		7,740
Polymer Corp. Reading, Pa.		590
Potash Co. of America Saskatoon, Saskatchewan, Canada		386
Potomac Edison Hagerstown, Md.		2,145
PPG Ind. Pittsburgh, Pa.		1,875
Proctor & Gamble St. Louis, Mo.		415
Reichhold Chemical Jacksonville, Fla.		11,372
Revere Copper Scottsboro, Ala.		10,150
Sangamo Electric Greenville, S.C.		37,400
S.C. Johnson & Son Racine, Wisc.		1,100
Shell Oil Morgan City, La.		42,790
Sherwin Williams Oakland, Calif.		2,792
Southwest Electric Oklahoma City, Okla.		2,700